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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

Christoper Kohls,

Plaintiff,

v.

Rob Bonta, et al.,

Defendants.

Case No. 2:24-cv-02527-JAM-CKD

**[Proposed] Order Granting
Plaintiffs' Motion for Summary
Judgment Against AB 2839**

Judge: John A. Mendez

The Babylon Bee, LLC, et al.

Plaintiffs,

v.

Rob Bonta, et al.,

Defendants.

Case No. 2:24-cv-02787-JAM-CKD

Rumble Inc., et al.

Plaintiffs,

v.

Rob Bonta, et al.

Defendants.

Case No. 2:24-cv-03315-JAM-CKD

X Corp,

Plaintiff,

v.

Rob Bonta, et al.

Defendants.

Case No. 2:24-cv-03162-JAM-CKD

**[PROPOSED] ORDER GRANTING PLAINTIFFS'
MOTION FOR SUMMARY JUDGMENT AGAINST AB 2839**

Upon consideration of the motion filed by Plaintiffs Christopher Kohls, The Babylon Bee, LLC, and Kelly Chang Rickert, for summary judgment in this matter, the oppositions thereto, and the entire record herein, it is this __ day of __, 2025, hereby ORDERED that Plaintiffs' motion for summary judgment is GRANTED, and it is further ORDERED that

Defendants Rob Bonta and Shirley N. Weber and their agents, employees, public servants, officers, and persons acting in concert with them, are HEREBY ENJOINED permanently from enforcing AB 2839, Cal. Elec. Code § 20012 *et seq.*, and it is further ORDERED that

Pursuant to 28 U.S.C. § 2201, the Court DECLARES that AB 2839 violates the First and Fourteenth Amendments to the United States Constitution and Article 1, Section 2, of the California Constitution, facially and as applied to Plaintiffs Christopher Kohls, The Babylon Bee, LLC, and Kelly Chang Rickert.

It is so ORDERED.

Dated: _____, 2025

The Honorable John A. Mendez
Senior United States District Judge